

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

YAN ZHANG a/k/a SOPHIA ZHANG, on her own
behalf and on behalf of others similarly situated,

CASE NO.: 18-cv-04615

Plaintiff,

OFFER OF JUDGMENT
PURSUANT TO FRCP 68

-against-

BRIGHTRAY DENTAL P.C. d/b/a BRIGHT RAY
DENTAL; LEI HUANG a/k/a RAYMOND HUANG
and SONIA YANG,

Defendants.

PLEASE TAKE NOTICE THAT, Defendants, by their attorneys Eckert Seamans
Cherin & Mellott, LLC, hereby offer to allow entry of judgment to be taken against them
pursuant to Rule 68 of the Federal Rules of Civil Procedures as follows:

A judgment in favor of the Plaintiff and against Defendants jointly and severally,
in the sum of Twenty-Five Thousand Dollars (\$25,000.00) less the amount of
costs including attorney fees accrued in favor of Plaintiff, with a result that the
total judgment amount, including all recoverable costs and attorney fees, which
the Defendants shall be obligated to pay shall be \$25,000.00. This shall be the
total amount to be paid by the Defendants on account of any and all liability
claimed in this action, including all costs of suit and attorney fees otherwise
recoverable in the action by the Plaintiff.

If Plaintiff does not accept this offer, they may become obligated to pay
Defendants' costs incurred after the making of this offer in the event Plaintiff
does not recover a judgment that is more favorable than this offer of judgment
pursuant to Rule 68(d) of the Federal Rules of Civil Procedures.

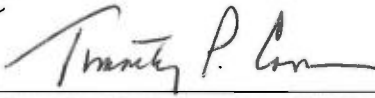
To accept this offer, Plaintiff must serve written notice of acceptance thereof
within fourteen (14) days of the date this offer is made.

This offer is not to be construed in any way as an admission of liability by
Defendants, but rather is made solely for the purpose of compromising a disputed
claim.

Dated: White Plains, New York
February 13, 2019

Yours, etc.

**ECKERT SEAMANS CHERIN & MELLOTT,
LLC**

By: 
Timothy P. Coon, Esq. (TPC-3357)
Attorneys for Defendants
10 Bank Street, Suite 700
White Plains, NY 10606
(914) 949-2909

TO: John Troy, Esq. (JT-0481)
Troy Law PLLC
Attorneys for Plaintiff
41-25 Kissena Blvd., Suite 119
Flushing, NY 11355
(718) 762-1324

CERTIFICATION OF SERVICE

I, Laverne Michael-Dean, of full age, hereby certifies:

I am employed with Eckert Seamans Cherin & Mellott, LLC. I certify that copies of **OFFER OF JUDGMENT PURSUANT TO FRCP 68** were electronically filed and served to the attorneys named herein below on the date listed below:

John Troy, Esq.
Troy Law PLLC
Attorneys for Plaintiff
41-25 Kissena Blvd., Suite 119
Flushing, NY 11355

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Laverne Michael-Dean

Dated: February 13, 2019